

### REMARKS

The Office Action dated March 6, 2006 has been received and carefully studied.

A Request for Continued Examination is filed herewith.

The Examiner has refused consideration of the patents recently submitted in an IDS, because they "pertain to ion-exchange which is not a feature of the instant application".

The refusal is respectfully traversed.

Applicants respectfully submit that the Examiner cannot unilaterally refuse consideration of material properly filed by way of an Information Disclosure Statement simply because he believes the material to be irrelevant. If the Examiner does not consider the references relevant, the proper procedure is to simply not apply them in any rejection; it is not to refuse consideration of them. Accordingly, consideration of the references, and an indication that the Examiner has done so by returning an initialed form PTO-1449, is respectfully requested. Applicants note that the references in question were submitted because they were cited in an International Search Report in a corresponding case.

The Examiner rejects claims 18-21 under 35 U.S.C. §112, second paragraph, as being indefinite. The Examiner states that the specification does not disclose structural

equivalents of the nesting type retaining means. By the accompanying amendment, the means-plus-function language has been deleted.

The Examiner maintains the rejection of claims 1-2 and 4-5 and 23 under 35 U.S.C. §102(b) as being anticipated by Brown, et al., U.S. Patent No. 4,990,248. The Examiner takes the position that Brown discloses a central tube (12 or 62) that is hollow by virtue of there being a cavity or space (40 or 87) within the tube.

By the accompanying amendment, claim 1 has been amended to recite that the hollow tube is the innermost tube in the module. Support for the amendment can be found in Figure 3, for example.

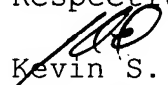
In contrast, the cavity or space the Examiner is referring to is the annular space between the winding tube 12 and the carrier tube 31. The winding tube 12 is not the innermost tube, as is the hollow tube of the present invention as now claimed.

The Examiner rejects the remaining claims under 35 U.S.C. §103(a) as being unpatentable over Brown in combination with various references. These remaining claims are believed to be allowable by virtue of their dependence, as none of the additional references cited in rejecting

these claims supplies the aforementioned deficiencies of Brown et al.

Reconsideration and allowance are respectfully requested in view of the foregoing.

Respectfully submitted,

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